

I strongly urge you to deny the All About The Message (AATM) petition to avoid regulation under the Telephone Consumer Protection Act (47 U.S.C. § 227). To allow AATM's petition to prevail would do a great disservice to the public.

Granting AATM's petition would result in denying the public of the full use of their cellular phones. Telemarketers would be free to flood consumer cellular phones with unwanted voice mail data to the point of incapacity. Potentially inhibiting truly urgent messages that could negatively affect a consumer financially, legally, medically, and/or emotionally.

Denying AATM's petition does not unfairly cause them harm, or others in the business of such marketing. There are many other avenues available to AATM and others: email, robo-calling, direct mail, face-to-face meetings, to name a few.

AATM's position is spurious and self-serving. I believe that if allowed, unscrupulous bad actors would argue that such a "non-call" would reach the legal definition of notice. That would be a very dangerous legal concept to codify putting at risk wide swaths of the public.

Thank you for your consideration of this commentary.